

MARQUIS AURBACH

10001 Park Run Drive
Las Vegas, Nevada 89145
(702) 382-0711 FAX: (702) 382-5816

Marquis Aurbach

Craig R. Anderson, Esq.

Nevada Bar No. 6882

Jackie V. Nichols, Esq.

Nevada Bar No. 14246

10001 Park Run Drive

Las Vegas, Nevada 89145

Telephone: (702) 382-0711

Facsimile: (702) 382-5816

canderson@maclaw.com

jnichols@maclaw.com

Attorneys for Defendants Las Vegas Metropolitan Police

Department and Officer A. Pavlov

UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

Todd Hoch,

Plaintiff,

vs.

Gaughan South LLC, d/b/a South Point Hotel
and Casino, The Las Vegas Metropolitan
Police Department, A. Pavlov (Doe
Defendant 1), John Monje (Doe Defendant
VIII), Angel Lopez (Doe Defendant IX),
Vincent Miozza (Doe Defendant X), Jordan
Etzig (Doe Defendant XIII) and any
remaining unnamed Defendant Does I-XV,

Defendants.

Case Number:
2:23-cv-00066-GMN-BNW

**STIPULATION AND ORDER TO
EXTEND LVMPD DEFENDANTS'
RESPONSE TO PLAINTIFF'S MOTION
FOR PARTIAL SUMMARY
JUDGMENT ESTABLISHING
LIABILITY FOR VARIOUS TORTS AS
INDICATED IN THE MEMORANDUM
BELOW**

(SECOND REQUEST)

Plaintiff Todd Hoch ("Plaintiff"), by and through his counsel of record, Robert A. Nersesian, Esq. and Thea Marie Sankiewicz, Esq., of Nersesian & Sankiewicz, Defendants, the Las Vegas Metropolitan Police Department (the "Department" or "LVMPD") and Officer A. Pavlov ("Pavlov"), collectively ("LVMPD Defendants"), by and through their counsel of record, Craig R. Anderson, Esq. and Jackie V. Nichols, Esq., of Marquis Aurbach, and Defendant Gaughan South LLC, d/b/a South Point Hotel and Casino ("Gaughan South"), by and through their counsel of record, Jose Carmona, Esq. and James P.C. Silvestri, Esq., of Pyatt Silvestri, hereby agree and jointly stipulate the following.

Accordingly, the parties hereby stipulate and agree as follows:

MARQUIS AURBACH

10001 Park Run Drive
Las Vegas, Nevada 89145
(702) 382-0711 FAX: (702) 382-5816

1 1. Plaintiff filed a Motion for Partial Summary Judgment Establishing Liability
2 for Various Torts as Indicated in the Memorandum Below on March 21, 2024 [ECF No. 49].

3 2. LVMPD Defendants' counsel had several conflicts that prohibited the
4 completion of LVMPD Defendants' Response to Plaintiff's Motion for Partial Summary
5 Judgment, including depositions in the case of *B.H., et al. v. CCSD, et al.*, United States
6 District Court, District of Nevada, Case No. 2:23-cv-00564-JCM-DJA, drafting an
7 approximately 50 page response to a dispositive motion in the case of *Phillip Semper, et al.*
8 *v. LVMPD, et al.*, United States District Court, District of Nevada, Case No. 2:20-cv-01875-
9 JCM-EJY and an Emergency Room trip to the hospital regarding an allergy attack.

10 3. The Parties further agree, LVMPD Defendants' Response to Plaintiff's
11 Motion for Partial Summary Judgment Establishing Liability for Various Torts [ECF No.
12 49] deadline currently set for April 25, 2024 shall be extended to Monday, April 29, 2024.

13 4. WHEREFORE, the parties respectfully request that LVMPD Defendants'
14 Response to Plaintiff's Motion for Partial Summary Judgment Establishing Liability for
15 Various Torts [ECF No. 49] be extended to and including Monday, April 29, 2024.

16 ...

17 ...

18 ...

19 ...

20 ...

21 ...

22 ...

23 ...

24 ...

25 ...

26 ...

27 ...

28 ...

5. The instant stipulation is being made in good faith and not for purposes of delay and that no party waives any arguments by entering into this stipulation.

IT IS SO STIPULATED.

Dated this 25th day of April, 2024.

NERSESIAN & SANKIEWICZ

By: /s/ Robert A. Nersesian
Robert A. Nersesian, Esq.
Nevada Bar No. 2762
Thea Marie Sankiewicz, Esq.
Nevada Bar No. 2788
528 S. Eighth Street
Las Vegas, Nevada 89101
Attorneys for Plaintiff Todd Hoch

Dated this 25th day of April, 2024.

MARQUIS AURBACH

By: /s/ Jackie V. Nichols
Craig R. Anderson, Esq.
Nevada Bar No. 6882
Jackie V. Nichols, Esq.
Nevada Bar No. 14246
10001 Park Run Drive
Las Vegas, Nevada 89145
Attorneys for Defendants Las Vegas
Metropolitan Police Department and
Officer A. Pavlov

Dated this 25th day of April, 2024.

PYATT SILVESTRI

By: /s/ Jose Carmona
Jose Carmona, Esq.
Nevada Bar No. 14494
James P.C. Silvestri, Esq.
Nevada Bar No. 3603
701 Bridger Avenue, Suite 600
Las Vegas, Nevada 89101
Attorneys for Gaughan South LLC, d/b/a
South Point Hotel and Casino

ORDER

The above Stipulation is hereby GRANTED.

IT IS SO ORDERED.


UNITED STATES DISTRICT JUDGE

CERTIFICATE OF SERVICE

I hereby certify that I electronically filed the foregoing **STIPULATION AND ORDER TO EXTEND LVMPD DEFENDANTS' RESPONSE TO PLAINTIFF'S MOTION FOR PARTIAL SUMMARY JUDGMENT ESTABLISHING LIABILITY FOR VARIOUS TORTS AS INDICATED IN THE MEMORANDUM BELOW (SECOND REQUEST)** with the Clerk of the Court for the United States District Court by using the court's CM/ECF system on the 25th day of April, 2024.

☒ I further certify that all participants in the case are registered CM/ECF users and that service will be accomplished by the CM/ECF system.

☐ I further certify that some of the participants in the case are not registered CM/ECF users. I have mailed the foregoing document by First-Class Mail, postage prepaid, or have dispatched it to a third party commercial carrier for delivery within 3 calendar days to the following non-CM/ECF participants:

N/A

/s/ Krista Busch

An employee of Marquis Aurbach

MARQUIS AURBACH

10001 Park Run Drive
Las Vegas, Nevada 89145
(702) 382-0711 FAX: (702) 382-5816